

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

LARRY FREDERICK and SHARON
FREDERICK,

Joint Debtors.

LARRY FREDERICK and SHARON
FREDERICK,

Movants,

v.

M&T BANK, THE UNITED STATES OF
AMERICA FARM SERVICE AGENCY,
CARGILL, INC., SUSQUEHANNA
COMMERCIAL FINANCE, INC.,
GROWMARK FS, LLC, FS FINANCIAL
SERVICES, LLC, WELLS FARGO
VENDOR FINANCIAL SERVICES, LLC,
BLAIR COUNTY TAX CLAIM BUREAU,
PENNSYLVANIA DEPARTMENT OF
REVENUE, AND THE INTERNAL
REVENUE SERVICE,

Respondents.

Bankruptcy No. 18-70870-JAD

Chapter 11

Related to Doc. No. 184, 205

Hearing Date: March 16, 2021 at 10:00 am
Response Deadline: February 16, 2021

**CERTIFICATION OF COUNSEL REGARDING
STIPULATION AND CONSENT ORDER RESOLVING
LIMITED OBJECTION TO JOINT DEBTORS' MOTION FOR SALE
OF REAL PROPERTY AND PERSONAL PROPERTY FREE AND
CLEAR OF ALL LIENS, CLAIMS AND ENCUMBRANCES**

The undersigned hereby certifies that agreement has been reached with the Joint Debtors, M&T Bank, and the United States Department of Agriculture, Farm Servicing Agency regarding the *Limited Objection to Joint Debtors' Motion for Sale of Real Property and Personal Property Free and Clear of All Liens, Claims and Encumbrances* filed by GROWMARK FS, LLC and FS Financial Services, LLC.

The signature requirements of W.PA.LBR 5005-6 have been followed in obtaining the agreement of all parties and is reflected in the attached document.

The undersigned further certifies that:

An agreed order and a black-lined version showing the changes made to the order originally filed with the court as an attachment to the motion is attached to this Certificate of Counsel. Deletions are signified by a line in the middle of the original text (strikeout) and additions are signified by text in italics. It is respectfully requested that the attached order be entered by the Court.

No other order has been filed pertaining to the subject matter of this agreement.

The attached document does not require a proposed order.

Dated: March 16, 2021

TUCKER ARENSBERG, P.C.

/s/ Ryan James

Ryan James

Pa. I.D. No. 82799

rjames@tuckerlaw.com

Michael A. Shiner

Pa. I.D. No. 78088

mshiner@tuckerlaw.com

Maribeth Thomas

Pa. I.D. No. 208376

mthomas@tuckerlaw.com

1500 One PPG Place

Pittsburgh, Pennsylvania 15222

Phone: (412) 566-1212

*Counsel to GROWMARK FS, LLC and FS
Financial Services, LLC*